80 Pine Street, 38th Floor New York, New York 10005 T. 212.532.1116 F. 212.532.1176

New Jersey Office 576 Main Street, Suite C Chatham, New Jersey 07928

JOHN ELEFTERAKIS\* NICHOLAS ELEFTERAKIS RAYMOND PANEK

OLIVER R. TOBIAS JEFFREY B. BROMFELD FAIZAN GHAZNAVI GABRIEL P. HARVIS BAREE N. FETT STEPHEN KAHN EVAN M. LA PENNA

KRISTEN PERRY – CONIGLIARO
AIKA DANAYEVA
ARIANA ELEFTERAKIS
MICHAEL INDELICATO
MICHAEL MARRON
DOMINICK MINGIONE
MARK NEWMAN
AGGELIKI E. NIKOLAIDIS
JOSEPH PERRY
MARIE LOUISE PRIOLO \*
KEYONTE SUTHERLAND
WAYNE WATTLEY

\*Also Admitted In New Jersey

ELEFTERAKIS ELEFTERAKIS & PANEK

September 30, 2021

## **BY ECF**

Honorable Vernon S. Broderick United States District Judge Southern District of New York 40 Foley Square New York, New York 10007 APPLICATION GRANTED SO ORDERED A. VERNON S. BRODERICK U.S.D.J. 10/1/2021

Re: Jacobs, et al. v. City of New York, et al., 18 CV 3275 (VSB)

## Your Honor:

I, along with Gabriel Harvis and Jeffrey Rothman, represent plaintiffs in the above-referenced action. Pursuant to the Court's order dated July 19, 2021, I write on behalf of the parties to provide a status report and to respectfully request that the stay be extended until November 30, 2021.

The parties have continued to work cooperatively to move this matter forward. On August 11, 2021, plaintiffs' out-of-state ballistics expert conducted his forensic evaluation, and anticipates having his report finalized by mid-November. The parties are hopeful that with the benefit of the report, we can then engage in meaningful settlement discussions that may obviate the need for deposition practice.

Accordingly, the parties respectfully request that the stay be extended until November 30, 2021, at which time the parties further request that they be permitted to submit a joint status letter advising of our progress.

Respectfully submitted,

Baree N. Fett

cc: All Counsel